

April 14, 2023

VIA eFILE AND E-MAIL

Hon. Martin Glenn
Chief United States Bankruptcy Judge
United States Bankruptcy Court
Southern District of New York
One Bowling Green, Courtroom 523
New York, NY 10004-1408

White & Case LLP
1221 Avenue of the Americas
New York, NY 10020-1095
T +1 212 819 8200

whitecase.com

***In re Celsius Network LLC, No. 22-10964 (MG) –
Request to Extend Objection Deadline Regarding Motion of The Official
Committee of Unsecured Creditors for Entry of an Order (I) Establishing
Procedures to Estimate the Intercompany Claim that Celsius Network, LLC
has against Celsius Network Limited and (II) Granting Related Relief
[Docket No. 2369]***

To the Chambers of the Honorable Martin Glenn:

As Your Honor is aware, the Debtors, the Committee, and the Series B Preferred Holders are engaged in discussions regarding an agreed schedule in connection with the *Series B Preferred Holders' Motion for Entry of an Order Establishing Estimation Procedures for the Intercompany Claim Between Celsius Network LLC and Celsius Network Limited in Furtherance of Formulating the Debtors' Plan of Reorganization* [Docket No. 2367] (the "**Series B Preferred Holders Estimation Motion**") and the *Motion of The Official Committee of Unsecured Creditors for Entry of an Order (I) Establishing Procedures to Estimate the Intercompany Claim that Celsius Network, LLC has against Celsius Network Limited and (II) Granting Related Relief* [Docket No. 2369] (the "**Committee Estimation Motion**"). The parties wish to continue these discussions in the hope of eliminating or narrowing any dispute. Accordingly, pursuant to paragraph 27 of the Case Management Procedures, which is attached as Exhibit 1 to the *Amended Final Order (I) Establishing Certain Notice, Case Management, and Administrative Procedures and (II) Granting Related Relief* [Docket No. 1181], the Committee requests that the Court confirm that the objection deadline in connection with the Committee Estimation Motion will be extended to **Monday, April 17, 2023 at 4:00 p.m. (prevailing Eastern Time)**. The objection deadline in connection with the Series B Preferred Holders Estimation Motion is already set for that date and time.

Hon. Martin Glenn
April 14, 202

Respectfully,

/s/ Samuel P. Hershey
Samuel P. Hershey
White & Case LLP

Counsel to the Official Committee of Unsecured Creditors

Cc: Christopher Koenig
Kirkland & Ellis LLP
Counsel to the Debtors

Nelly Almeida
MILBANK LLP
Counsel to the Series B Preferred Holders

Joshua M. Mester
JONES DAY
Counsel to the Series B Preferred Holders

Pursuant to the Case Management Order ¶ 25 [Docket No. 1181], the deadline for objections to the Series B Preferred Holders Estimation Motion and the Committee Estimation Motion, which are scheduled to be heard on April 18, 2023, is **April 15, 2023, at 4:00 p.m.** (prevailing Eastern Time).

The Committee's request that "the Court confirm that the objection deadline in connection with the Committee Estimation Motion will be extended to Monday, April 17, 2023 at 4:00 p.m. (prevailing Eastern Time)" is **DENIED**.

MEMORANDUM ENDORSED

IT IS SO ORDERED.

Dated: April 14, 2023
New York, New York

/s/ Martin Glenn
MARTIN GLENN
Chief United States Bankruptcy Judge